

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

In re:

BUILDERS MUTUAL DATA SECURITY
INCIDENT LITIGATION

Case No. 5:23-CV-579-M-KS

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Plaintiffs Matthew Kocher, Mark Rogolino, and James Jackson (collectively “Plaintiffs” or “Settlement Class Representatives”) through counsel, hereby submit the following Unopposed Motion for Preliminary Approval of Class Action Settlement. The Court’s approval of the proposed settlement is warranted for the reasons fully stated in accompanying Memorandum.

For the reasons set forth in said Memorandum, Plaintiffs respectfully request that the Court: (1) preliminarily approve the proposed Settlement Agreement pursuant to Fed. R. Civ. P. 23(c) and (e); (2) preliminarily certify the proposed Settlement Class; (3) preliminarily approve the proposed Class Notice and Notice forms; and (4) schedule a Final Approval Hearing to consider the proposed Settlement, and approval of attorneys’ fees, costs, and service award.

DATED: August 1, 2024

Respectfully submitted,

RHINE LAW FIRM, P.C.

/s/ Joel R. Rhine

Joel R. Rhine

NCSB 16028

Email: irr@irr@rhinelawfirm.com

Ruth A. Sheehan

NCSB 48069
Email: ras@rhinelawfirm.com
1612 Military Cutoff Road Suite 300
Wilmington NC 28403
Telephone (910) 772-9960
Fax (910) 772-9062

Dana Smith, Bar No. 51015
Mason A. Barney (*pro hac vice*)
Tyler J. Bean (*pro hac vice*)
SIRI & GLIMSTAD LLP
745 Fifth Avenue, Suite 500
New York, New York 10151
Telephone: (212) 532-1091
E: dsmith@sirillp.com
E: mbarney@sirillp.com
E: tbean@sirillp.com

Raina C. Borrelli (*pro hac vice*)
STRAUSS BORRELLI PLLC
980 N. Michigan Avenue, Suite 1610
Chicago, Illinois 60611
T: (872) 263-1100
F: (872) 263-1109
raina@straussborrelli.com

Daniel Srourian (*pro hac vice*)
SROURIAN LAW FIRM, P.C.
3435 Wilshire Blvd. Suite 1710
Los Angeles, CA 90010
T: (213) 474-3800
E: daniel@slfla.com